

EXHIBIT 19

(December 26, 2019 H. Cooper to M. Voris and A. Carey)



Todd & Weld LLP

Howard M. Cooper
E-mail: hcooper@toddweld.com

December 26, 2019

Via Certified Mail

Mr. Michael Voris
Sr. Executive Producer
Church Militant
2900 Hilton Road
Ferndale, MI 48220

Ms. Anita Carey
c/o Church Militant
2900 Hilton Road
Ferndale, MI 48220

Re: The Very Reverend Georges F. de Laire, J.C.L.

Dear Mr. Voris and Ms. Carey:

Please be informed that this office acts as counsel to the Very Reverend Georges F. de Laire, J.C.L. ("Father de Laire").

I write in connection with Father de Laire's claims against you, Church Militant and St. Michael's Media arising from articles and videos posted by you and your website, Church Militant. The articles at issue include, without limitation, the January 17, 2019 article titled "NH Vicar Changes Dogma Into Heresy", the April 15, 2019 video series titled "Attacking the Good Guys" and the June 25, 2019 article title "NH Diocese Violates Parishioners' Rights to Demolish Church." These publications, which target Father de Laire and his character following the Diocese of New Hampshire's issuance of certain precepts against the Slaves of the Immaculate Heart of Mary, the Saint Benedict Center, Inc. of Richmond, New Hampshire, and the Immaculate Heart of Mary School ("Saint Benedict Center"), are highly inflammatory and are rife with outright falsehoods and inaccurate implications. It is clear that each of you chose to ignore and/or failed to appropriately research even the most basic information concerning Father de Laire and his actions prior to publishing these statements. Moreover, you failed to ever reach out to Father de Laire for comment prior to the publication of your initial article in January of 2019. Had you done so, perhaps you would have reviewed the basic facts surrounding Father de Laire prior to making the defamatory statements which now open both you and your companies up to significant liability.

Because you are the author of the stories at issue and Mr. Voris is also the registered agent of Church Militant, I am writing to each of you directly to point out certain specific



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inaccuracies in what you wrote. Of course, it is likely that you were already aware of these inaccuracies, but it is important to have a record of these issues, so that you understand the gravity of the situation if it cannot be resolved at this stage. I am also copying the Registered Agent of St. Michael's Media, Inc., as it is also liable for each of your actions.

As you are well aware, the Saint Benedict Center in question, after losing a variety of court decisions in Massachusetts, decided to establish itself as a separate group from the one founded by Leonard Feeney, a priest accused of anti-Semitism and excommunicated from the Catholic Church in 1953. In 2016, the Congregation for the Doctrine of the Faith in Rome declared "unacceptable" (which means, for these purposes, "erroneous and contrary to Church teachings") the manner with which the Saint Benedict Center interpreted the Catholic doctrinal principle "*extra ecclesiam nulla salus*," (which means, "outside the Church there is no salvation"). Rome pronounced the matter closed – meaning it was no longer open to dialog or debate.

Informed of the decision made by Rome, the Diocese of Manchester (the "Diocese") continued to work with the Saint Benedict Center to pastorally accommodate the members by granting permission for a priest in good standing (i.e., not a member of the Saint Benedict Center) to offer ministry at the Center. However, the Saint Benedict Center leadership manipulated this gesture of goodwill to imply support by the Catholic Church. Therefore, on January 7, 2019, the Diocese issued certain precepts, which were consistent with the previous declarations issued by Rome, limiting the activities of the Saint Benedict Center, and their declarations of affiliations with the Catholic Church.

Shortly after the issuance of those precepts, you published the January 17, 2019 article at churchmilitant.com. To begin, the title of the January 2019 piece states that Father de Laire changed "Dogma into Heresy." The title of that piece alone is untrue and conveys a false impression to your several thousand readers. You were well aware that the decision by Rome, and the precepts issued by the Diocese, were not about the Saint Benedict Center's teaching of the principle "*extra ecclesiam nulla salus*," but rather the manner in which they were (and are) interpreting that principle. Further, and more specifically, you were fully aware that Father de Laire did not accuse the Saint Benedict Center of heresy for teaching a well-accepted Catholic doctrine, and yet you implied such with the title and contents of your January 17, 2019 article.

That article then proceeded to launch into a series of personal attacks against Father de Laire, none of which are supported by revealed sources. For example, you wrote the following untrue statements, none of which are attributed to a verifiable source:

- De Laire is "said by current work colleagues to be emotionally unstable in his role as chief canonical judge of the diocese and counselor to his bishop";
- "Church Militant has learned that there is much more than meets the eye to his fresh attack upon a group of devout lay Catholics";



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- “De Laire is said to be desperate to repair his image and save his chances at being promoted as bishop or an official of the Roman Curia”;
- “With incompetence in canonical matters also apparently well-known and corroborated in the Roman Curia”;
- “de Laire is nicknamed in those halls [of the Roman Curia] *un incasinaro*, “a troublemaker,” owing to his notorious botching of canonical cases involving clergy and other matters”;
- “Multiple independent sources in the Roman Curia say he has repeatedly botched diocesan cases and embarrassed his bishop before the Roman congregations of the Curia”;
- “Church Militant has learned he is currently outsourcing work product that he as a canon lawyer is being paid well by the diocese to complete himself”
- “he is said by priests and laity who currently work with him in the diocese to be a vindictive and manipulative clericalist who pines to be named a bishop or an official of the Congregation for the Doctrine of the Faith”
- “Additional questions are raised ... by his acquisitions ... Church Militant has learned that de Laire now frequently resides at an estate located near Manchester that he currently purchased, currently valued at \$1.5 million.”

These statements range from utterly and provably false to implicitly untrue. For example, Father de Laire has never outsourced his work as a canon lawyer, at any time, and it is simply not credible that anyone would have reported as much to you or to anyone else at Church Militant. Additionally, Father de Laire has never “botched” a canonical or diocesan case involving clergy or other matters and has never been seen as “incompetent.” Accordingly, it is simply not credible that you or Church Militant has learned – from any source – that Father de Laire has a nickname of “*un incasinaro*” in the Roman Curia. Following several discussions, it is further not credible that any of Father de Laire’s “current work colleagues” have informed you or Church Militant that he is “emotionally unstable”, or that there is “much more than meets the eye” concerning the 2019 decision by the Diocese related to the Saint Benedict Center. Father de Laire is not “desperate to repair his image,” as his “image” had suffered no harm until your article was published.

As an example of knowingly false implications contained in the publications, you wrote in the January 17, 2019 article that “at least three complaints against de Laire have been filed with the Holy See and made known to Libasci. Together they allege corruption, abuse of office, grave violations of the law, and incompetence as a canonist.” However, if you or someone else at Church Militant somehow became aware of these confidential “complaints,” you surely were aware that all three were made by the same complainant, in a single submission. The complaint


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is highly confidential, in order to protect the complainant and related parties, and could not have been disclosed to you or anyone else at Church Militant without violating that confidentiality.

Since the only persons outside the Roman Curia (who are bound by confidentiality) who have knowledge of the complaint are persons with a particular bias, and one that is clearly oriented against Father de Laire, it was not responsible journalism for you and your publication to accept this [anonymous] source at face value, without conducting a further investigation -- an investigation you did not conduct prior to publishing the January 17, 2019 article. See, e.g., Celle v. Filipino Reporter Enterprises, Inc., 209 F.3d 163, 190 (2nd Cir., 2000) (journalist found reckless where “there are obvious reasons to doubt the veracity of the informant or the veracity of his reports”). Further, the complaint was not credited by the Holy See or Bishop Libasci, because the Complainant was clearly biased and disgruntled over an unfavorable outcome. Once again, this is information that would have been available to you from the same source that disclosed the fact of the complaint, and yet you chose not to publish this balancing information.

You further knowingly and falsely implied that Father de Laire engaged in improper financial dealings, through the purchase of a home near Manchester. There is certainly no basis for your implication that Father de Laire acquired property in a questionable manner. The severity of the impropriety that you implied is so extreme, that it resulted in an immediate reaction amongst your readership. Father de Laire received a threatening phone call, referring to the statement you wrote about his home, within an hour of the publication of your article. The harm suffered by Father de Laire as a result of this false statement continues to this day.

It further appears that this libelous attack was undertaken in order to garner support for the Saint Benedict Center, the group that was subject to certain precepts issued by the Diocese on January 7, 2019, as well as prior censuring opinions by other Catholic authorities. Your reporting mischaracterized those precepts, and in so doing, you further engaged in libel against Father de Laire, by suggesting that he engaged in an “attack” against the members of this group, when he did no such thing. In contrast, Father de Laire has spent several months, and in fact years, working with the members of the Saint Benedict Center to find areas of agreement, and solutions to the disagreements between that group and the Diocese.

All of the statements made in the January 17, 2019 article were made without any attempt to meet with or speak with Father de Laire, which further evidences your bias in investigating and reporting on these events.

In the video published on April 15, 2019, of which a transcript is published on your website, you and/or Church Militant made several false statements about Father de Laire, all of which constitute libel and defamation, including but not limited to the following:

- You stated that daily Mass isn’t “allowed to be offered anymore”, when in fact, Father de Laire arranged for a priest to travel to a nearby parish to provide a weekend Latin Mass to the members of the Saint Benedict Center;


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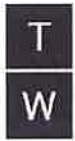
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- You stated that Father de Laire is responsible for “attacks” against the group, and that he began launching “broad­sides” against the group shortly after being promoted to Judicial Vicar “about two years ago.” As you likely understood at the time of publication, as it was clear from the long history of the Diocese’s dealings with the Saint Benedict Center, Father de Laire was simply the person who communicated the decision of the Diocese. This information was readily available to anyone who had done even minimal research into the issue. Further, Father de Laire has been a fierce advocate for the members of the Saint Benedict Center and has worked tirelessly to find some peaceful resolution to the tension and disagreement between the group, the Diocese and the Church. Father de Laire’s efforts included several trips to Rome in an attempt to identify solutions. Additionally, Father de Laire was promoted to Judicial Vicar and Vicar for Canonical Affairs in 2013 – more than five years before the precepts were issued. It was in his capacity as Vicar for Canonical Affairs, and not as Judicial Vicar, that he was involved with this dispute. Again, very basic investigation would have revealed these facts.
- You stated that “it’s clear that de Laire wants the community to simply give up and move on, and he’s making life very difficult for them in the meanwhile” when, as stated above, Father de Laire has worked to accommodate the group to every extent possible, both before and after the precepts were issued. Once again, any modest investigation, which went beyond reliance on biased sources, would have revealed this information.

Further, the video went on to repeat several of the same libelous and defamatory statements included in the January 17, 2019 article. Each of these false statements were likely designed to incite your readership to believe that Father de Laire had acted with ill will against the Saint Benedict Center, for the purpose of eliciting donations. Your website where the transcript is posted contained a link to the Saint Benedict Center fundraising page (<https://fundingmorality.com/project/view/saint-benedict.html>), where the group was raising funds.

The June 25, 2019 article, authored by Ms. Carey, proceeded to parrot several of the above untrue statements, evidently without undertaking any independent investigation. This also constitutes libel and defamation, to the same extent as the original misstatements.

Although I have focused on some of the specific factual inaccuracies, it is worth pointing out that in their entirety your publications portray Father de Laire in a false and defamatory manner. It is of course your right to have a poor opinion of Father de Laire and to disagree with him or his actions. It is also your right to express your negative personal feelings in your writings. However, what you cannot do, and what the law does not allow, is for you to report outright falsehoods and substantially untrue facts about the target of your attack in an effort to try and provide a basis for your negative personal opinion, or to raise funds. What you wrote about



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Father de Laire purported to convey as fact numerous mistruths and distortions, all in a conscious effort to hold him up to public ridicule and scorn. This is libel.

Despite your libelous and defamatory media campaign, Father de Laire seeks here only an apology and a retraction from you, the contents of which he is willing to consider based upon what you yourself propose. Father de Laire also seeks a commitment from you that publication of false and defamatory statements will not be repeated. The apology and retraction must appear under your by-line in a position of equal prominence as the offending articles and videos. The offending article and videos must also be deleted from your website, along with their comments and any links to them contained on your website, or any affiliated websites which you or your companies control. You must also enter into a written agreement expressing your commitment not to repeat the publication of the false and defamatory statements. It is my hope that despite what you wrote about him, you will agree that Father de Laire is entitled to be portrayed accurately in the media and that you will have the courage and integrity to apologize for your failure to report about him in an accurate manner. Please have your legal counsel contact me by December 31, 2019 concerning your position on this proposal.

Please know that while it is Father de Laire's hope to resolve this matter in this manner, he is willing to pursue his rights in a court of law, and to seek all remedies that are available in that forum. Father de Laire reserves all rights.

Very truly yours,

Howard M. Cooper

HMC/emj

cc: Mr. Philip Haapala
Registered Agent
St. Michael's Media, Inc.
2840 Hilton Road
Ferndale, MI 48220